

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:

Review of the Section 251 Unbundling
Obligations for Incumbent Local Exchange
Carriers

CC Docket No. 01-338

Implementation of the Local Competition
Provisions of the Telecommunications Act of
1996

CC Docket No. 96-98

Deployment of Wireline Services Offering
Advanced Telecommunications Capability

CC Docket No. 98-147

SBC'S REQUEST FOR WAIVER OF PAGE LIMIT

On October 2, 2003, nine Petitions for Reconsideration of the Commission's *Triennial Review Order* were filed ("Petitions"). On October 9, 2003, the Commission issued a Public Notice requesting oppositions to the Petitions within 15 days of the date of public notice of the Petitions in the Federal Register, which occurred on October 22, 2003. Neither the Public Notice nor the Federal Register specify whether parties shall file a single document in response to all the Petitions, or separate documents in response to each of the Petitions. The Public Notice and Federal Register also are silent as any page limits for oppositions to the Petitions.

Pursuant to Rule 1.49(f), oppositions to a petition for reconsideration shall not exceed 25 pages. Thus, in the normal course, the page limit for each party in responding to each of the Petitions would be 25 pages. However, for the sake of efficiency, SBC has chosen to file a single document in response to all of the Petitions rather than separate responses. The Petitions address several discrete issues of fundamental importance, and a

response of more than 25 pages is required in order to thoroughly address all of the issues. Accordingly, given the breadth of the issues and the volume of the Petitions, in the event that Rule 1.49(f) is deemed to apply to SBC's response, SBC respectfully requests that the Commission grant a waiver of the rule.

Respectfully submitted,

/s/ Jim Lamoureux

Jim Lamoureux
Christopher M. Heimann
Gary L. Phillips
Paul K. Mancini

SBC COMMUNICATIONS INC.
1401 Eye Street, N.W., Suite 400
Washington, D.C. 20005
(202) 326-8895 – Voice
(202) 408-8745 – Facsimile

Its Attorneys

November 6, 2003